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Attorney for Robert Buckhannon

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT BUCKHANNON

Defendant.

CASE NO. 2:14-CR-00315-JCM-VCF

**STIPULATION AND [PROPOSED
ORDER] TO MODIFY PRETRIAL
RELEASE CONDITIONS OF
SUPERVISION**

Defendant Robert Buckhannon ("Mr. Buckhannon") by and through his attorney of record Michael V. Cristalli, Esq., of the law firm Gentile Cristalli Miller Armeni & Savarese, and Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney Kathryn Newman hereby stipulate as follows:

1. That Mr. Buckhannon works for Clinical Testing Corp as an Executive Vice President of New Business Development. *See* Exhibit 1 (Letter From John Rittenour, CEO Clinical Testing Corp, LLC).
2. That Mr. Buckhannon is responsible for education and sales training of the company's national Account Executives and for the implantation of Laboratory services in clinics and medical facilities nationwide. *See* Exhibit 1.
3. That Mr. Buckhannon negotiates, facilitates, and implements the utilization of multiple reference labs around the company to ensure excellent patient care and customer service. *See* Exhibit 1.

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4. That Mr. Buckhannon's position requires him to travel throughout the continental United States and Hawaii to train, manage, and maintain sales volumes. *See* Exhibit 1.
5. That Mr. Buckhannon's ability to travel to jurisdictions outside of Clark County, Nevada is imperative to fulfill his responsibilities as Executive Vice President of New Business Development outlined above. *See* Exhibit 1.
6. That Mr. Buckhannon's conditions of pretrial supervision should be modified to allow him to travel throughout the continental United States and Hawaii as approved by Pretrial Services and consistent with his employment responsibilities.
7. That counsel for Mr. Buckhannon communicated with the United States and the United States has communicated with Mr. Buckhannon's pretrial officer Kimu Kopanui. Neither the Assistant United States Attorney, Kathryn Newman, or Mr. Buckhannon's pretrial officer, Kimu Kopanui, have any objections to the request.

IT IS SO STIPULATED

GENTILE CRISTALLI MILLER
ARMENI & SAVARESE

By: /s/Kathryn C. Newman
KATHRYN NEWMAN
Assistant United States Attorney

By: /s/Michael V. Cristalli
MICHAEL V. CRISTALLI
Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

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ROBERT BUCKHANNON

Defendant.

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~~PROPOSED~~ ORDER] TO MODIFY
PRETRIAL CONDITIONS OF
SUPERVISION

The Court has read and considered the Stipulation regarding the request to modify the conditions of pretrial supervision. The Court hereby finds that the Stipulation, which the Court incorporates by reference into this order, demonstrates facts that support Defendant Robert Buckhannon's request to Modify Pretrial Conditions of Supervision in this matter. THEREFORE, FOR GOOD CAUSE SHOWN:

Mr. Robert Buckhannon is allowed to travel the continental United States and Hawaii as approved by Pretrial Services and consistent with his employment responsibilities.

IT IS SO ORDERED.

July 13, 2015

DATE



THE HONORABLE GEORGE FOLEY, JR.
UNITED STATES DISTRICT COURT
MAGISTRATE JUDGE

Respectfully Submitted:

GENTILE CRISTALLI MILLER
ARMENI & SAVARESE

/s/Michael V. Cristalli

MICHAEL V. CRISTALLI

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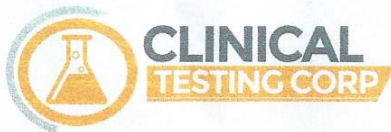
Las Vegas, NV 89145

Phone: (702) 880-0000

Attorney for Robert Buckhannon

EXHIBIT 1

EXHIBIT 1



Clinical Testing Corp, LLC
4325 Dean Martin Drive Suite #340
Las Vegas, NV 89103

Michael Cristalli, Esq.

June 23, 2015

Dear Mr. Cristalli,

I am writing this letter to you on behalf of Robert Buckhannon in hopes that you will be able to modify his current travel restrictions.

Dr. Buckhannon is my company's Executive Vice President of New Business Development. As such, he is responsible for Education and Sales training of our national network of Account Executives. He is also responsible for the implantation of Laboratory services in clinics and medical facilities nationally. Dr. Buckhannon also negotiates, facilitates and implements the utilization of multiple reference labs around the company so that we can provide the best patient care and customer service to our referring physicians and their patients.

We have marketing coverage in all of the continental US and Hawaii. The management, training and ultimate sales volume falls under Robert's prevue and his ability to travel to manage this process is essential for him to be able to adequately perform those tasks. I have attached a portion of the scheduled travel over the next three months. There will undoubtedly be additional travel to this as the business continues to evolve.

- June 22nd- 30th: Florida: implementation of Pharmacogenetic testing and Medication therapy management protocols for several home health agencies.
- July 1-8th: Training for McLaren health systems. Sales presentation for 2 other hospital chains in Michigan
- Week of July 12th: Las Vegas & Hartford Connecticut. Evaluate lab opportunity
- July 15-17 Pharmacogenitc testing New Orleans, LA
- July 19th Colorado two days to implement training program for sales force
- July 23rd Florida Follow up of training and implementing for home health
- Jul 28-29 Sales training Orange County CA
- July 30-31 Visit Lab Porterville CA
Systems evaluation of Lab Procedures
- August 3-8: Vegas, Phoenix, San Diego - Finish negotiating lab contracts and in service large Primary Care groups
- August 10-11 : Detroit Regional Sales Training
- August 13-14 Boise Idaho - Follow up of implementation with Several Home Health agencies and Assisted living facilities.
- Aug 18-19 Redmond WA Implementation of Pharmacy review protocols for Assisted living facilities

Please let me know if you need any additional information from me to assist Robert in this process.

Regards,

John Rittenour
CEO Clinical Testing Corp, LLC